

Neel Chatterjee (SBN 173985)  
*nchatterjee@goodwinlaw.com*

James Lin (SBN 310440)  
*jlin@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
135 Commonwealth Drive  
Menlo Park, California 94025  
Tel.: +1 650 752 3100  
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)  
*bschuman@goodwinlaw.com*

Shane Brun (SBN 179079)  
*sbrun@goodwinlaw.com*

Rachel M. Walsh (SBN 250568)  
*rwalsh@goodwinlaw.com*

Hayes P. Hyde (SBN 308031)  
*hhyde@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
Three Embarcadero Center  
San Francisco, California 94111  
Tel.: +1 415 733 6000  
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)  
*hvu@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
601 S. Figueroa Street, 41st Floor  
Los Angeles, CA 90017  
Tel.: +1 213 426 2500  
Fax.: +1 213 623 1673

*Attorneys for Defendant  
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS REPLY  
TO MOTION FOR RELIEF FROM NON-  
DISPOSITIVE PRETRIAL ORDER OF  
MAGISTRATE JUDGE (DKT. 881)**

Courtroom: 8, 19th Floor  
Judge: Honorable William Alsup  
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:

1. Declaration of Hong-An Vu
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this motion for an order to file under seal its Reply to the Motion for Relief from Non-Dispositive Pretrial Order of Magistrate Judge (Dkt. 881) (the “Reply”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following document:

Document	Portions to Be Filed Under Seal
Reply	Highlighted Portions

The highlighted portions of the Reply contain highly confidential, sensitive business information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate structure, and financial information and may contain such highly confidential, sensitive business information of Uber relating to Uber’s agreements. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. If this information were made public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking structures its business agreements, allowing them to modify their own business strategy. Otto Trucking’s competitive standing could be significantly harmed.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Motion’s supporting documents that merit sealing.

Dated: July 24, 2017

Respectfully submitted,

By: /s/ Hong-An Vu

Neel Chatterjee  
*nchatterjee@goodwinlaw.com*

Brett Schuman  
*bschuman@goodwinlaw.com*

D. Shane Brun  
*sbrun@goodwinlaw.com*

Rachel M. Walsh  
*rwalsh@goodwinlaw.com*

Hong-An Vu  
*hvu@goodwinlaw.com*

Hayes P. Hyde  
*hhyde@goodwinlaw.com*

James Lin  
*jlin@goodwinlaw.com*

**GOODWIN PROCTER LLP**

*Attorneys for Defendant:*  
Otto Trucking LLC

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 24, 2017. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 24th day of July 2017 in Los Angeles, California.

/s/ Hong-An Vu  
Hong-An Vu